

THE HONORABLE JOHN C. COUGHENOUR

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON**

DAVID SARRUF,

Plaintiff,

v.

LILLY LONG TERM DISABILITY PLAN &
LILLY LIFE INSURANCE PLAN,

Defendant.

Case No. 2:24-cv-00461-JCC

STIPULATED MOTION AND
[PROPOSED] ORDER TO MODIFY
SCHEDULING ORDER

Defendants The Eli Lilly and Company Long Term Disability Plan (the “LTD Plan”)¹ and The Eli Lilly and Company Life Insurance and Death Benefit Plan (the “Life Insurance Plan”)² (collectively, “Defendants”), by and through their attorneys, hereby file this stipulated Motion respectfully requesting that the Court modify the case schedule issued by minute order dated July 19, 2024 (Dkt. 20).

In support of this Motion, Defendants state that Court’s minute order requires Defendants to provide the draft administrative record to Plaintiff by August 14, 2024. Dkt. 20. Defendants have been working diligently to assemble the draft administrative record, including collecting and reviewing electronic documents. However, Defendants have encountered delays in the

¹ The LTD Plan is incorrectly named in the Complaint as the Lilly Long Term Disability Plan.

² The Life Insurance Plan is incorrectly named in the Complaint as the Lilly Life Insurance Plan.

course of this process. Due to these delays and the volume of documents that Defendants are reviewing to ensure that the administrative record is complete, Defendants need additional time to provide the draft administrative record to Plaintiff. For these reasons, Defendants respectfully request that this Court amend the current case schedule as follows:

Current Date	New Proposed Date	Deadline
August 14, 2024	August 28, 2024	Deadline for Defendants to provide the draft administrative record to Plaintiff
August 28, 2024	September 11, 2024	Deadline for Plaintiff to advise Defendants of any proposed changes to the draft administrative record
September 11, 2024	September 23, 2024	Deadline for the parties to file the administrative record with the Court

Counsel for Defendants has conferred with counsel for Plaintiff, and counsel for Plaintiff stipulates to this request.

Date: August 12, 2024

Respectfully submitted,

THE ELI LILLY AND COMPANY LONG TERM
DISABILITY PLAN AND THE ELI LILLY AND
COMPANY LIFE INSURANCE AND DEATH
BENEFIT PLAN

By: /s/ Douglas F. Stewart
Douglas F. Stewart (#34068)
Bracewell, LLP
701 Fifth Ave, Suite 3420
Seattle, WA 98104
Telephone: 206-204-6200
Fax: 800-404-3970
doug.stewart@bracewell.com

Aviva Grumet-Morris (*admitted pro hac
vice*)
WINSTON & STRAWN LLP
35 West Wacker Drive
Chicago, IL 60601-9703
agmorris@winston.com

1 Telephone: 312-558-5600
2 Facsimile: 312-558-5700

3 *Attorneys for Defendants The Eli Lilly and*
4 *Company Long Term Disability Plan and*
5 *The Eli Lilly and Company Life Insurance*
6 *and Death Benefit Plan*

7 KANTOR & KANTOR LLP

8 By: /s/ Glenn R. Kantor
9 Brent Dorian Brehm, *Pro Hac Vice*
10 Glenn R. Kantor, *Pro Hac Vice*
11 9301 Corbin Ave, Ste 1400
12 Northridge, CA 91324
13 Telephone: 818-886-2525
14 Fax: 818-350-6272
15 bbrehm@kantorlaw.net
16 gkantor@kantorlaw.net

17 Stacy M. Tucker, WSBA 43449
18 Monahan Tucker Law, P.C.
19 14241 NE Woodinville-Duvall Rd., Suite
20 382 Woodinville, WA 98072
21 Telephone: 866-255-8612
22 Fax: 206-800-7801
23 SMTucker@mtlawpc.com
24 *Attorneys for Plaintiff*

[PROPOSED] ORDER EXTENDING DEADLINE FOR RESPONSIVE PLEADINGS

This matter came regularly before the Court through the stipulation filed by the Parties above. The Court, having considered the stipulation and the facts described therein, finds good cause for the agreed-upon proposed dates and hereby ORDERS the following schedule:

New Date	Deadline
August 28, 2024	Deadline for Defendants to provide the draft administrative record to Plaintiff
September 11, 2024	Deadline for Plaintiff to advise Defendants of any proposed changes to the draft administrative record
September 23, 2024	Deadline for the parties to file the administrative record with the Court

IT IS SO ORDERED this 12th day of August 2024.



THE HONORABLE JOHN C. COUGHENOUR
UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of August 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record who receive CM/ECF notifications.

Dated: August 12, 2024

By: /s/ Douglas F. Stewart
Douglas F. Stewart, WSBA No. 34068